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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
(NORTHERN DIVISION - RENO)

GRANT MATTHEW YOUNGREN,  
*Plaintiff,*

vs.

OWNIT MORTGAGE SOLUTIONS, INC., a  
California Corporation, et al,  
*Defendants.*

Case No. 3:09-cv-595 - LRH-VPC

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO ANSWER OR  
OTHERWISE RESPOND TO  
COMPLAINT**

***(SECOND REQUEST)***

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1     **I.     INTRODUCTION**

2                     Plaintiff Grant Matthew Youngren and Defendants MERSCORP, Inc. and  
3     Mortgage Electronic Registration Systems, Inc. (together, "MERS") enter into this stipulation for  
4     an enlargement of time for MERS to respond to the Complaint for the following reasons:<sup>1</sup>

5                     Plaintiff has requested that this case be stayed pending resolution of its Motion to  
6     Remand (Doc. # 10). Defendants did not oppose the request for a stay. Further, as stated in  
7     Plaintiff's and MERS' Notice of Related Cases, this case is one of several related cases pending  
8     in the District of Nevada. *See* Doc. ## 8, 17. MERS has requested that this and two other related  
9     cases be transferred to Judge Jones (Doc. # 17) and has, additionally, filed a Notice of Tag-Along  
10    Actions before the Judicial Panel on Multidistrict Litigation ("the MDL Panel") requesting that  
11    the MDL Panel consider this action, as well as several other similar actions, as part of a group of  
12    cases subject to transfer and consolidation. *See* Doc. # 25.

13                    None of the motions, including Plaintiff's Motion to Remand (Doc. # 4),  
14    Plaintiff's Motion to Stay (Doc. # 10), MERS' Request to Transfer (Doc. # 17), nor MERS'  
15    Section 1407 motion to transfer and consolidate certain cases have been resolved. Therefore, the  
16    procedural future of this case is unclear. An enlargement of time for MERS to respond to the  
17    Complaint until the questions of whether this case will be remanded, transferred, and/or  
18    consolidated are resolved would promote efficiency and economy by conserving the resources of  
19    the parties, this Court, several of this Court's district and magistrate judges, the state courts from  
20    which these cases were removed, and the MDL Panel. Accordingly, Plaintiff and MERS enter  
21    into the following stipulation and request that the Court endorse the below order.

22                    **II.     STIPULATION**

23                    Plaintiff, GRANT MATTHEW YOUNGREN by and through his undersigned  
24    counsel of record, the Law Office of Rick Lawton, and Defendants MERSCORP, Inc. and  
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26    <sup>1</sup> MERS recognizes that this Court, on October 13, 2009, ordered that no further extensions of time to  
27    respond to the Complaint should be granted to MERS. Given the procedural history of this case and recent  
28    events which have occurred (and that are outlined in this Stipulation), MERS, in good faith, believes a  
  second enlargement of time to respond to the Complaint would promote efficiency and conserve the Court  
  and the parties' resources.

Mortgage Electronic Registration Systems, Inc., by and through their counsel of record, Snell & Wilmer, and in accordance with LR 7-1, hereby stipulate that Defendants MERSCORP, Inc. and Mortgage Electronic Registration Systems, Inc. shall have up to and including **60 days** from entry of this order to answer or otherwise respond to the complaint in the above-captioned matter or **10 days** from the resolution of Plaintiff's Motion to Remand to State Court (Doc. # 3) and the Judicial Panel on Multidistrict Litigation's determination as to whether this case will be transferred to the MDL (*see* Doc. # 25) should these events occur before the expiration of the 60-day period.

Respectfully submitted, dated this 6th day of November, 2009.

/s/ Rick Lawton  
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*Attorneys for Defendants MERSCORP, Inc. and  
Mortgage Electronic Registration Systems, Inc.*

**ORDER**

**IT IS SO ORDERED.**

DATED this 10th day of November, 2009.



LARRY R. HICKS  
UNITED STATES DISTRICT JUDGE